

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Cr. No.

Honorable

Violation:

Case: 2:21-cr-20764

Judge: Steeh, George Caram

MJ: Grey, Jonathan J.C.

Filed: 12/29/2021

INF USA V AHMED (LH)

18 U.S.C. § 641

Federal Program Fraud

D-1, MOHAMMED K. AHMED,

Defendant.

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

D-1, MOHAMMED K. AHMED

GENERAL ALLEGATIONS

1. The Supplemental Nutrition Assistance Program (SNAP) is a federal program that provides nutrition benefits and assistance to eligible low-income individuals and families. SNAP is funded by the Food and Nutrition Services Agency (FNS) of the United States Department of Agriculture.

1. During the approximate time-period from 2009 through 2014, defendant MOHAMMED K. AHMED operated Hera Fish Market (HERA FISH), located in Hamtramck, Michigan.

2. During the aforementioned time-period, HERA FISH was authorized to accept benefits for the Special Supplemental Nutrition Program (SNAP).

3. Retailers participating in SNAP were advised that program regulations required that benefits could only be used by recipients to purchase eligible food items and not to obtain cash or unauthorized items. In Michigan, SNAP benefits were funds by the United States Department of Agriculture through the Michigan Department of Health and Human Services (MDHHS).

4. As a participating food retailer in SNAP, the market had on its premises computerized electronic benefits terminal (EBTs) to process electronic benefit transactions under SNAP.

5. From in or about 2009 and continuing through 2014, MOHAMMED K. AHMED knowingly devised and engaged in a scheme to defraud the USDA and MDHHS by directly purchasing SNAP benefits from benefit recipients in violation of program regulations. MOHAMMED K. AHMED did this by exchanging benefits for cash at a discounted rate and by allowing recipients to use benefits to purchase ineligible items. The transactions were processed through EBT terminals at the markets, as though MOHAMMED K. AHMED had sold eligible food items to the SNAP beneficiaries.

6. Transactions were conducted by MOHAMMED K. AHMED and by employees acting under his direction.

7. Every SNAP transaction through the EBT at the market resulted in the transmission of electronic data, by wire in interstate commerce, between the market's terminals in the Eastern District of Michigan and SNAP servers located outside the state of Michigan.

8. During the above time-period, MOHAMMED K. AHMED and store employees acting under his direction unlawfully obtained approximately \$1,427,679.76 in SNAP benefits.

COUNT ONE
18 U.S.C. §641
Federal Program Fraud

D-1 MOHAMMED K. AHMED

9. The General Allegations of This Information are incorporated by reference, as if set forth in full herein.

10. Beginning in 2009 and continuing through 2014, said time-period being approximate, in the Eastern District of Michigan, defendant MOHAMMED K. AHMED knowingly and willfully engaged in a scheme to steal and purloin more than \$1,000 of funds of the United States: that is, defendant MOHAMMED K. AHMED engaged in a scheme to defraud the United States Department of Agriculture Supplemental Nutrition Assistance Program (SNAP). Defendant MOHAMMED K. AHMED and others working with him, fraudulently processed

the purchase of more than \$1,000.00 of SNAP benefits through the HERA FISH point-of-sale terminal, as purchases of eligible food items, thereby obtaining the full dollar amount of the SNAP benefits from the United States Department of Agriculture.

11. In violation of Title 18 United States Code, Section 641.

FORFEITURE ALLEGATION

***18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c)
Criminal Forfeiture***

12. The allegations contained in Count One of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

13. Upon conviction of the offense in violation of Title 18, United States Code, Section 641 set forth in Count One of this Information, the defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. As part of forfeiture, the United States may seek entry of a forfeiture money judgment.

14. If any of the property described above, as a result of any act or omission of

the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

Respectfully submitted,

DAWN K. ISON
Acting United States Attorney

s/ Stanley J. Janice
Stanley J. Janice
Assistant United States Attorney
211 W. Fort St., Suite 2001
Detroit, MI 48226
(313) 226-9740
lee.janice@usdoj.gov

Dated: December 29, 2021

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number 2:21-cr-20764
--	----------------------------------	-------------------------------------

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: SJJ

Case Title: USA v. MOHAMMED K. AHMED

County where offense occurred : Wayne County

Check One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☐ Indictment/ ☒ Information --- **no** prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
-----------------------	----------------	--

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

December 29, 2021
Date

s/ Stanley J. Janice
 Stanley J. Janice
 Assistant United States Attorney
 211 W. Fort Street, Suite 2001
 Detroit, MI 48226-3277
 Phone: 313-226-9740
 Fax:
 E-Mail address: Lee.Janice@usdoj.gov
 Attorney Bar #:

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.